

LEONARD PEÑA (State Bar No. 192898)
PEÑA & SOMA, APC
lpena@penalaw.com
479 South Marengo Ave., Suite B
Pasadena, California 91101
Telephone 626-396-4000
Facsimile 626-498-8875

Attorneys for Plaintiff
Carolyn A. Dye, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re: URBAN COMMONS, LLC, Debtor.	Case No.: 2: 21-bk-13523 WB Chapter 7
CAROLYN A. DYE, Chapter 7 Trustee, Plaintiff, v. JOSEPH FAN Defendant.	Adv. No.: 2:23-ap-01254 WB PLAINTIFF'S NOTICE OF SETTLEMENT IN PRINCIPLE AND REQUEST TO CONTINUE STATUS CONFERENCE <u>Pretrial Conference</u> DATE: April 22, 2024 TIME: 2:00 P.M. COURTROOM: 1375 ADDRESS: 255 E. Temple St. Los Angeles, CA 90012

The Plaintiff respectfully notifies the Court that the parties agreed in principle to settle the above-captioned matter. Counsel for the parties are in the process of preparing and finalizing the Settlement Agreement ("Agreement") and a

1 motion, if necessary, to approve the Agreement. The parties
2 intend to complete the Agreement as soon as practicable, but
3 Plaintiff respectfully requests that the Court continue the
4 Status Conference for approximately 60 days to finalize the
5 Agreement and for the filing any motion to approve the
6 agreement.

7
8 Dated: April 20, 2025

PEÑA & SOMA, APC

9
10 By: LEONARD PEÑA
11 LEONARD PEÑA
12 Attorneys for Plaintiff
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 479 South Marengo Ave., Pasadena, CA 91101

A true and correct copy of the foregoing document entitled (*specify*): PLAINTIFF'S NOTICE OF SETTLEMENT IN PRINCIPLE AND REQUEST TO CONTINUE STATUS CONFERENCE will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 4/20/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Carolyn A Dye (TR) trustee@cadye.com, c197@ecfcbis.com; atty@cadye.com
Jeffrey P Nolan on behalf of Defendant Joseph Fan jnolan@pszjlaw.com
Leonard Pena on behalf of Plaintiff Carolyn A. Dye
lpena@penalaw.com, penasomaecf@gmail.com; penalr72746@notify.bestcase.com
United States Trustee (LA) ustpreregion16.la.ecf@usdoj.gov

☐ Service information continued

on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 4/20/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Julia W. Brand
United States Bankruptcy Court
255 E. Temple Street, Suite 1382
Los Angeles, CA 90012

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/20/2025
Date

NOEMI SANDOVAL
Printed Name

/S/ NOEMI SANDOVAL
Signature